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12 Attorneys for Defendant
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14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**
16 **SACRAMENTO DIVISION**

17 UNITED STATES OF AMERICA,

Case No. 2:23-CR-00320-TLN

18 Plaintiff,

**JOINT STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE**

19 vs.

Date: September 18, 2025
Time: 9:30 AM
Judge: Hon. Troy L. Nunley

20 SHAHRIAR "SEAN" LOLOEE, KARLA
MONTOYA, MIRWAIS SHAMS, and AHMAD
21 "SHAH" SHAMS,

22 Defendants.

23 **STIPULATION**

24 1. Defendants Sean Loloe, Karla Montoya, Mirwais Shams, and Shah Shams, by
and through their undersigned counsel, and the United States, through its undersigned counsel,
hereby agree and request that the status conference currently set for Thursday, September 18,
2025, at 9:30 AM, be vacated and continued until Thursday, October 9, 2025, at 9:30 AM.

25 2. The parties agree that a short continuance is necessary due to a medical procedure

1 of Mr. Loloe.

2 3. By previous order, this matter was set for status on July 10, 2025. (Mins., ECF No.
3 155.) Also by previous order, time under the Speedy Trial Act was excluded through September
4 23, 2025. (Order, ECF No. 153.)

5 4. By this stipulation, the parties now request that the Court enter an order excluding
6 time under the Speedy Trial Act between September 23, 2025, and October 9, 2025, under Local
7 Code T4.

8 5. The parties agree and stipulate, and request that the Court find the following:

9 a) The discovery in this case consists of at least ten terabytes of data that was
10 previously produced to defense counsel on multiple hard drives. The discovery in this case
11 also includes dozens of boxes of physical employment records, which must be reviewed in
12 person, which has been either produced directly to defense counsel and/or made available
13 for inspection and copying. To date, defense counsel has reviewed hundreds of thousands
14 of pages of discovery and the government continues to produce discovery.

15 b) The government does not object to the requested exclusion of time.

16 c) Based on the above-stated findings, the ends of justice served by excluding
17 time as requested outweigh the interest of the public and the defendants in a trial within
18 the original date prescribed by the Speedy Trial Act.

19 d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §
20 3161, *et seq.*, within which trial must commence, the time period of September 23, 2025,
21 to October 9, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §
22 3161(h)(7)(A), B(iv) [Local Code T4] because it results from an exclusion granted by the
23 Court at the defendants' request on the basis of the Court's finding that the ends of justice
24 served by taking such action outweigh the best interest of the public and the defendants in
25 a speedy trial.

26 6. Nothing in this stipulation and order shall preclude a finding that other provisions
27 of the Speedy Trial Act dictate that additional time periods are excludable from the period within
28

1 which a trial must commence.

2 IT IS SO STIPULATED.
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4 Dated: September 3, 2025

ERIC GRANT
Interim United States Attorney

5 fair

/s/ SAM STEFANKI
AUDREY HEMESATH
MATTHEW THUESEN
SAM STEFANKI
Assistant United States Attorneys

6 Dated: September 3, 2025

/s/ SHERRY D.H. HAUS
SHERRY D.H. HAUS
Counsel for Defendant SEAN LOLOEE

7 Dated: September 3, 2025

/s/ KEVIN JAMES ROONEY
KEVIN JAMES ROONEY
Counsel for Defendant SEAN LOLOEE
/s/ THOMAS A. JOHNSON
THOMAS A. JOHNSON
Counsel for Defendant SEAN LOLOEE

8 Dated: September 3, 2025

/s/ WILLIAM J. PORTANOVA
WILLIAM J. PORTANOVA
Counsel for Defendant KARLA MONTOYA

9 Dated: September 3, 2025

/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant MIRWAIS SHAMS

10 Dated: September 3, 2025

/s/ TIMOTHY E. WARRINER
TIMOTHY E. WARRINER
Counsel for Defendant AHMAD SHAMS

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2 **ORDER**
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4 **IT IS SO ORDERED.**
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6 Dated: September 3, 2025
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10 Troy L. Nunley
11 Chief United States District Judge
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